

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

IN RE MUTUAL FUNDS  
INVESTMENT LITIGATION

MDL 1586

This Document Relates To:  
The Putnam Subtrack

Civil Action No. 04-MD-15863  
Honorable J. Frederick Motz

*Shahi, et al. v. Putnam Investments, et al.*

Civil Action No. 04-2605

**ASSENTED-TO MOTION RE: PRETRIAL SCHEDULE**

Plaintiff Kaveh Shahi and counsel for Defendant Putnam U.S. Holdings I, LLC

(sued herein as "Putnam Investments") ("Putnam") have agreed that:

1. In the interest of efficiency, the next phase of this action shall entail Putnam filing a motion to dismiss pursuant to F.R. Civ. P. 12(b);
2. Following the Court's ruling on such motion, if the motion is not granted in full the parties will propose a schedule for further pretrial proceedings (including Rule 26(a) exchanges, discovery and summary judgment practice); and
3. The following schedule shall govern the motion to dismiss:
  - a. Putnam's moving papers June 3, 2013 (on or before)
  - b. Plaintiff's opposition June 17, 2013 (on or before)
  - c. Putnam's reply July 1, 2013 (on or before)

Wherefore, with the assent of Plaintiffs, Putnam respectfully requests that the Court enter a scheduling order consistent with the above.

Respectfully submitted,

/s/ James R. Carroll

James R. Carroll

SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP

One Beacon Street

Boston, Massachusetts 02108

Tel: (617) 573-4800

Fax: (617) 573-4822

Email: james.carroll@skadden.com

Counsel for Defendant Putnam Investments